

R-1C COMPLIANCE AND
ENFORCEMENT
CORRESPONDENCE

International Fuel C.

195 Governors Highway
P.O. Box 739
South Windsor
Connecticut 06074

AUG 29 1988

International
Fuel Cells

August 23, 1988

Mr. Arthur K. Wing IV
U.S. Environmental Protection Agency
Region 1
J.F.K. Federal Building
Boston, MA 02203

Dear Mr. Wing:

Enclosed please find copies of the following documents which you requested during your visit on August 5, 1988.

1. Waste Generation Instructions for P&W I.D. #3010 & 3011 ✓
2. Test analysis for uncured phenolic resin, microgrinding dust and graphite/resin separator plate
3. Representative samples of Detex clock rounds by Plant Protection personnel.

Note: Numeral #1 indicates Hazardous Waste Shed Station. Tape is reviewed and filed by Plant Protection Supervisor each day.

4. Incident Reports on storage building dated 2-28-86 and 1-12-88. ✓
5. Copy of Lab Pack Disposal dated 5-12-88 ✓
6. Job description for Mr. J. Victor Congdon - Manager/Assembly, Test and Plant Engineering. Mr. Congdon is also designated "Environmental Coordinator" for International Fuel Cells.

Please find enclosed herewith the job descriptions for the Plant Protection personnel. Please be advised that the job descriptions used are general and are not all encompassing. The capabilities and responsibilities of the personnel are found not only in the job descriptions, but in the records of training that have already been provided. For instance, all employees required to handle hazardous waste have been trained and we consider the training records to be additional to their job descriptions.

Mr. Arthur K. Wing IV

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August 23, 1988

In answer to your question, perchlorethylene has been used for a short period in 1988 in our development manufacturing area. We have less than 2 gallons in a mixed solvents hazardous waste barrel. At this time, we no longer use perchlorethylene.

Your recommendations for improvement of Closure Plan and Inspection Plan have been noted and are being incorporated into our Part "B" application.

Sincerely,

INTERNATIONAL FUEL CELLS

A handwritten signature in dark ink, appearing to read "J. Victor Congdon". The signature is fluid and cursive, with the first and last names being more prominent.

J. Victor Congdon
Environmental Coordinator

/kab
Enclosures